

4848-5450-5553/452-1702

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Attorneys for Defendants  
BINLI TRUCKING, INC. and ZHAO G. JIANG

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

-----X  
ANTHONY N. MORIN, :  
 :  
 Plaintiff, :  
 :  
 – against – :  
 :  
 BINLI TRUCKING, INC., ZHAO G. :  
 JIANG, JOHN DOES 1-10 (being fictitious :  
 persons whose identities are currently :  
 unknown) and ABC CO. 1-10 (being :  
 fictitious business entities whose identities :  
 are currently unknown), :  
 :  
 Defendants :  
-----X

NOTICE OF REMOVAL

The notice of removal of defendants Binli Trucking, Inc. and Zhao G. Jiang states:

1. On or about August 7, 2017, plaintiff Anthony N. Morin filed a civil action for damages for personal injuries against defendants Binli Trucking, Inc. (Binli Trucking) and Zhao G. Jiang (Jiang), and various John Doe and ABC defendants, in New Jersey Superior Court, Hudson County, under docket no. HUD-L-3237-17. Complaint, Exhibit A. No other process, pleadings, or orders have been served.
2. The citizenship of the named defendants was completely diverse when the action was commenced and is diverse at the filing of this notice of removal in that plaintiff is a

citizen of New Jersey residing at 532 Garden Street, Hoboken, New Jersey; Binli Trucking is incorporated in California and has its principal place of business at 3221 Vineland Avenue, Apt. 32, Baldwin Park, California 91706; and Jiang is a citizen of Virginia residing at 10806 Valley Falls Court, Manassas, Virginia 20112. The citizenship of the John Doe and ABC defendants is disregarded pursuant to 28 U.S.C. section 1441(b)(1).

3. The amount in controversy exceeds \$75,000, exclusive of interest and costs, inasmuch as plaintiff claims severe and grievous personal injuries and asserts that the incident complained of required plaintiff to undergo spinal surgery within two weeks of its occurrence, resulting in over \$300,00 in medical expenses.

4. This notice is timely inasmuch as neither Binli Trucking nor Jiang had been served with the summons and complaint at October 11, 2017.

5. No defendant is a citizen of New Jersey.

6. This action is removed to this Court.

Dated: Teaneck, NJ  
October 16, 2017

LESTER SCHWAB KATZ & DWYER, LLP

S/ Dennis M. Rothman

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Dennis M. Rothman